

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Simmons, James : CHAPTER 13
Simmons, Keisha :
: CASE NO. 19-01991-RNO

NOTICE OF MOTION AND RESPONSE DEADLINE

Debtors, James Simmons and Keisha Simmons, by and through their attorney, Patrick J. Best, Esquire, of ARM Lawyers, has filed a Motion to Modify a Confirmed Chapter 13 Plan with the court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this Bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **October 6, 2020** you or your attorney must do the following:

- a. File an answer explaining your position at

United States Bankruptcy Court
Max Roseann US Courthouse
197 South Main Street
Wilkes-Barre, PA 18701

If you mail your answer to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- b. Mail a copy of the movant's attorney

Patrick J. Best, Esquire
18 N. 8th St.
Stroudsburg PA 18360

2. If you or your attorney does not take the steps described in paragraphs 1(a) and 1(b) above, the court may enter an order granting relief requested in the motion.

3. A Hearing on this Motion will only be scheduled if you or your attorney file an Answer or Objection to this Motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

Date: September 15, 2020

/s/ Patrick J. Best
Patrick J. Best, Esquire
Attorney for Debtors
ARM Lawyers
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